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July 26, 2022

VIA ECF

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Honorable John P. Cronan
United States District Court, Southern District of New York
500 Pearl St., Room 1320
New York, NY 10007

Re: Vekaria v. MThree Corporate Consulting, Ltd. et al.
Case Number: 1:22-cv-03197-JPC-JLC
Letter Motion to Extend Time to Serve Individual Defendants

Dear Judge Cronan:

I represent the Plaintiff in the above referenced action. Further to ECF No. 29 and Federal Rule of Civil Procedure 4(m), Plaintiff hereby requests an extension of time to serve the individual defendants Alex Headley, Benjamin Town, Thomas Seymour, and Richard Chapman in this action, each of whom are believed to be residing in the United Kingdom.

All of the corporate defendants have been served in this action. Defendants MThree Corporate Consulting, LTD, and John Wiley & Sons, Inc. have appeared in this action, while ECI Partners LLC has not appeared in this action or timely responded to the complaint despite being served on May 17, 2022. We had anticipated that counsel for the corporate defendants may be representing some or all of the individual defendants, as several of the individual defendants are believed to be employed by one of the corporate defendants. We have been informed by counsel for Wiley and MThree that he will not be representing any of the individual defendants, and we have yet to hear from ECI or its counsel.

We understand that all of the individual defendants may be residing in the United Kingdom. We have attempted to locate their whereabouts, which we have not be able to ascertain to date based on traditional methods. This will require that we take further, more extensive efforts to locate them, which may entail the use of a professional investigator in the United Kingdom.

Based on the foregoing reasons, and for good cause, we respectfully request an extension through September 25, 2022 to effectuate service on the individual defendants.

I thank the Court and Your Honor for your consideration of this letter motion.

Respectfully submitted,

/s/ Travis Tatko